

## AREA OF REVIEW AND CORRECTIVE ACTION PLAN SUMMARY 40 CFR 146.84(b)

### YAMS CO<sub>2</sub> Sequestration Project

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#### **1.0 Facility Information**

Facility name: YAMS CO<sub>2</sub> Sequestration Project  
YAMS CCS 1 Well

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Well location: [REDACTED], Louisiana

#### **2.0 Overall Summary of the Area of Review and Corrective Action Plan**

The plan deals with delineating the Area of Review (AoR) and provides corrective actions that are needed in the wells that penetrate the upper confining zone within the AoR. Delineation of the AoR is one of the key elements in Class VI Rule to ensure USDWs in the region surrounding the geologic sequestration project may not be endangered by the injection activity.

The AoR is defined as the larger of the maximum extent of the a) free-phase CO<sub>2</sub> plume or b) pressure boundary within which brines from the injection zone can migrate into overlying USDW via leaky wells, faults, or breaches of the confining zone. Both the CO<sub>2</sub> plume and the critical pressure front are determined using a multiphase CO<sub>2</sub>-brine transport model, which is constructed from a sophisticated geologic model that accounts for site-specific hydrogeology. The methods and approaches for developing this complex multiphase simulation model and delineating the AoR are defined below.

Control of the pore space, into which the free-phase CO<sub>2</sub> plume is predicted to migrate, is a requirement for a Class VI permit. In Louisiana, the pore space is owned by the surface owner of the land. An agreement has been made with the landowners regarding pore space ownership in the YAMS CO<sub>2</sub> Sequestration Project.

Plan revision number: 1  
Plan revision date: 6/30/21

The proposed AoR includes legacy wells, according to the records obtained from LDNR. A detailed analysis was performed to evaluate the risk and timing of the plume and/or pressure front reaching wells inside the AoR, relative to the project schedule, to propose corrective actions and a timeline for these procedures.

Oxy Low Carbon Ventures, LLC will re-evaluate the AoR every five years during the injection and post-injection phases. In addition, monitoring and operational data will be reviewed periodically by Oxy Low Carbon Ventures, LLC during the injection and post-injection phases.

Additional details for the AoR and corrective actions are included in the project Area of Review and Corrective Action Plan document of the permit.